

AR 201-13915



13 August 2002

Ms. Christine Todd Whitman, Administrator
U.S. Environmental Protection Agency
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Subject: High Production Volume (HPV) Chemical Challenge Program – Lyondell
Chemical Company Registration No. () - Request for Deletion of an
HPV Listed Chemical

Dear Administrator Whitman:

The Lyondell Chemical Company respectfully requests that the HPV designation for Isocyanic acid, (2, 4, 6 – trioxo-s-triazine- 1, 3, 5, (2H, 4H, 6H)-triyl) tris(hexamethylene) ester (CAS RN 3779-63-3) be changed to "no longer HPV".

Background

The manufacturing facility at which this chemical was produced was built by Olin Mathieson in 1934. The facility was acquired by Arco Chemical Company in 1996 and was then acquired by Lyondell in 1998 in its acquisition of Arco Chemical. This chemical was produced as part of the aliphatics diisocyanate (ADI) business.

In late 2001, Lyondell exited the ADI business and production of this chemical was discontinued. The IUR report for 2002 will show production that occurred prior to the discontinuation. Lyondell does not intend to resume production of this material at any time in the future.

According to the EPA HPV web site information, Arco Chemical was the only company to report this material in the 1998 IUR.

Because Lyondell (Arco Chemical) was the only listed producer of the material and Lyondell has ceased production and does not intend to produce it in the future, Lyondell requests that EPA change the designation for CAS # 3779-63-3 to "no longer HPV".

Summary

Lyondell respectfully requests that CAS # 3779-63-3 be designated as "no longer HPV."

Sincerely,

Dr. Wm. Claude White
Lyondell Chemical Company

Cc: Charles Auer, EPA
HPV File

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To: NCIC OPPT/DC/USEPA/US@EPA, Rik Chem/DC/USEPA/US@EPA
cc:

Subject: HPV Chemical Challenge Program - Lyondell Chemical Company Reg. #)

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